

UNITED STATES DISTRICT COURT

for the
District of New JerseyIn the Matter of the Search of
(Briefly describe the property to be searched
or identify the person by name and address)a DNA sample, specifically a buccal swab,
of Michael Webb, who is an inmate at Camden County
Correctional Facility

Case No. 25-mj-4044 (MJS)

APPLICATION FOR A WARRANT BY TELEPHONE OR OTHER RELIABLE ELECTRONIC MEANS

I, a federal law enforcement officer or an attorney for the government, request a search warrant and state under penalty of perjury that I have reason to believe that on the following person or property (identify the person or describe the property to be searched and give its location):

See Attachment A.

located in the _____ District of _____ New Jersey _____, there is now concealed (identify the person or describe the property to be seized):

See Attachment B.

The basis for the search under Fed. R. Crim. P. 41(c) is (check one or more):

- ☒ evidence of a crime;
- ☐ contraband, fruits of crime, or other items illegally possessed;
- ☐ property designed for use, intended for use, or used in committing a crime;
- ☐ a person to be arrested or a person who is unlawfully restrained.

The search is related to a violation of:

Code Section	Offense Description
18 U.S.C. § 922(g)(1)	Possession of a firearm by a convicted felon

The application is based on these facts:
See Attachment C

- ☒ Continued on the attached sheet.
- ☐ Delayed notice of _____ days (give exact ending date if more than 30 days: _____) is requested under 18 U.S.C. § 3103a, the basis of which is set forth on the attached sheet.


 Applicant's signature

 Ryan McGowan, Special Agent, ATF
 Printed name and title
Attested to by the applicant in accordance with the requirements of Fed. R. Crim. P. 4.1 by
_____ telephone _____ (specify reliable electronic means).

Date:

June 2, 2025 at Camden, NJ


 Judge's signature

City and state: Camden, New Jersey

 Honorable Matthew J. Skahill, U.S.M.J.
 Printed name and title

CONTENTS APPROVED
UNITED STATES ATTORNEY

By: Josephine J. Park

Josephine J. Park
Assistant United States Attorney

Date: June 2, 2025

ATTACHMENT A

Description of Person to be Searched

The person to be searched is Michael Webb, a 41-year-old male, born on April 21, 1984, and residing at Camden County Correctional Facility located at 330 Federal Street, Camden, New Jersey, 08103.

ATTACHMENT B

Item to be Seized

DNA via oral secretion (epithelial cells) from the inner cheek lining of the mouth.

ATTACHMENT C

**AFFIDAVIT IN SUPPORT OF
AN APPLICATION FOR A SEARCH WARRANT**

I, Ryan McGowan, being first duly sworn, hereby depose and state as follows:

INTRODUCTION AND AGENT BACKGROUND

1. I make this affidavit in support of an application for a search warrant for a DNA sample, specifically a buccal swab, of Michael Webb ("WEBB"), who is an inmate at Camden County Correctional Facility located at 330 Federal Street, Camden, New Jersey, 08103.

2. I am a Special Agent with the Bureau of Alcohol, Tobacco, Firearms, and Explosives ("ATF") and have been since November 2015. Prior to joining ATF, I was a U.S. Customs and Border Protection ("CBP") Officer at the Philadelphia International Airport from January 2014 to November of 2015.

3. I have attended and graduated from U.S. CBP Officer Basic Training, Criminal Investigator Training Program, and ATF Special Agent Basic Training. All training programs were held at the Federal Law Enforcement Training Center in Brunswick, Georgia.

4. I have extensive experience investigating crimes involving firearms trafficking, criminal possession and use of firearms and explosives, arson, distribution of controlled substances, and crimes of violence affecting interstate commerce. I have been an affiant on numerous search warrants to include vehicles, residences, cell phone data extraction, social media accounts, and historical cell site data as part of ATF criminal investigations. I have participated in physical

surveillance operations and have participated in the execution of state and federal arrest warrants and search warrants. As a result of my training and experience, as well as the training and experience of other investigators, I am familiar with investigations involving violations of federal criminal laws and executing federal search warrants and seizing evidence in accordance with probable cause.

5. The facts set forth in this Affidavit are based on: (a) my own personal knowledge and observations; (b) knowledge obtained from other individuals, including other law enforcement officers who are involved in the investigation and who have engaged in numerous investigations involving violations of federal firearms laws; (c) my review of documents and records related to this investigation; (d) communications with others who have personal knowledge of the events and circumstances described herein; and (e) information gained through my training and experience.

6. Because this affidavit is submitted for the limited purpose of securing a search warrant to obtain a DNA sample of WEBB, I have not set forth each and every fact known to me concerning this investigation. Where I assert that an event occurred on a particular date, I am asserting the event occurred on or about the date alleged.

7. Based on my training and experience and the facts as set forth in this affidavit, there is probable cause to believe that evidence, fruits, and instrumentalities of violations of Title 18, United States Code, Section 922(g)(1) will be found on WEBB.

PROBABLE CAUSE

8. In May 2024, the members of the United States Marshals Service Regional Fugitive Task Force (“RFTF”) were assisting the U.S. Marshals Colorado Violent Offender Task Force with apprehending WEBB, who was wanted by the State of Colorado for a parole violation.

9. On May 13, 2024, RFTF members learned that WEBB was in the area of 34th and Rowe Streets in Camden, New Jersey. Later that day, two RFTF members—Detective Baruch Zepeda and Sergeant Timothy Purnell—saw WEBB enter a vehicle near 34th and Rowe Streets in Camden.

10. Detective Zepeda attempted to stop the vehicle, but WEBB fled from Detective Zepeda, driving down Rowe Street at a high rate of speed. WEBB eventually collided with a parked vehicle at the intersection of 35th and Rowe Streets. WEBB then ran towards the house on the 400 block of N. 35th Street.

11. At the time, the owner of the house on the 400 block of N. 35th Street (the “Homeowner”) was standing outside of his house near the chain fence that led to the side alley. WEBB approached the Homeowner holding a firearm and the Homeowner immediately moved out of the way, allowing WEBB to run through the side alley towards the back of the residence.

12. When Detective Zepeda approached the location where WEBB had collided with a parked car, he saw the Homeowner pointing in the direction of the side alley, which led to his backyard. Detective Zepeda then ran after WEBB in the

same direction. As Detective Zepeda ran through the alley, he saw WEBB jumping over the fence at the back of the Homeowner's property.

13. After WEBB jumped over the fence, he ran along the fence towards Fairfax Drive. Detective Zepeda also noticed that as WEBB was running, he was holding his arms in front of his body near his waistband.

14. WEBB then attempted to run towards the rear of a residence on the 500 block of N. 36th Street, but was unsuccessful because he was unable to jump over a large metal gate.

15. At that point, Detective Zepeda caught up to WEBB. Detective Zepeda drew his firearm, ordered WEBB to get on the ground, and placed him in handcuffs. Shortly thereafter, once Sergeant Purnell arrived on scene and WEBB was secured in a police vehicle, Detective Zepeda walked over to the metal gate and observed a firearm on the ground a few feet from the metal gate.

16. The firearm was a silver Ruger, model GP100, .357 Magnum caliber revolver, bearing serial number 171-09888 (the "Firearm") loaded with six rounds of ammunition (the "Ammunition").

17. Several minutes later, Detective Zepeda spoke with the Homeowner about his observations of WEBB. According to the Homeowner, WEBB had run up to him holding a silver firearm. At the time, the Homeowner believed WEBB was a police officer because he was holding a gun, so he immediately moved out of WEBB's way. Shortly thereafter, the Homeowner heard a lot of noise coming from

his backyard. The Homeowner later learned that WEBB had knocked down the ladder holding up his back fence.

18. WEBB was arrested and charged in Camden County with unlawful possession of a weapon, among other charges.

19. A Camden County Police Department Crime Scene Officer collected the Firearm and transported it to the Police Administration Building. The Firearm was then swabbed for potential DNA using sterile swab and distilled water (the “DNA Swabs”), then packaged and logged in the Camden County Police Department Crime Scene Unit Temporary Evidence Holding Area.

20. On April 2, 2025, a federal grand jury sitting at Camden, returned a one-count indictment charging WEBB with knowingly possessing a firearm after a felony conviction, in violation of 18 U.S.C. § 922(g)(1).

21. On May 29, 2025, a forensic scientist at the New Jersey State Police Office of Forensic Sciences determined that there was a “moderate stringency match” between the DNA Swabs and the Combined DNA Index System (CODIS) profile of WEBB.¹

¹ According to the FBI website on DNA, a “moderate stringency” match occurs when there is “a partial match between a forensic profile and an offender profile is observed during a routine [National DNA Index System] database search.” *See* <https://www.fbi.gov/how-we-can-help-you/dna-fingerprint-act-of-2005-expungement-policy/codis-and-ndis-fact-sheet>.

CONCLUSION

22. Based on the forgoing, I respectfully submit that there is probable cause to believe that DNA of WEBB may be found on the DNA Swabs taken from the Firearm. I further submit that there is probable cause to believe that these items constitute evidence of a federal crime, that is a violation of 18 U.S.C. § 922(g)(1). Accordingly, I request that the Court issue a warrant to collect DNA from WEBB so that a forensic scientist at the New Jersey State Police Office of Forensic Sciences may determine if DNA Swabs contain the DNA of WEBB.

DNA COLLECTION

23. The DNA sample will be collected in the Camden County Correctional Facility. A buccal swab kit of WEBB will be conducted for the collection of DNA.

Respectfully submitted,



Ryan McGowan
Special Agent, ATF

Special Agent Ryan McGowan attested to this Affidavit by telephone pursuant to FRCP 4.1(b)(2)(A) on this 2nd day of June, 2025



HONORABLE MATTHEW J. SKAHILL
United States Magistrate Judge